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March 14, 2025

VIA ECF

Hon. Denise L. Cote
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Grant Recd.
Denise Cote
March 17, 2025

Re: *Adams v. New York County District Attorney's Office et al.*
1:23-cv-10574 (DLC)

Dear District Judge Cote:

I am an Assistant Corporation Counsel in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, representing Defendants New York County District Attorney's Office and City of New York in the above-referenced action. I write to respectfully ask the Court to so order five subpoenas, due for response by Plaintiff's medical providers by 5:00 p.m. on March 21, 2025, for Plaintiff's medical records in order to obtain them prior to Plaintiff's deposition during the week of March 24, 2025. Plaintiff provided HIPAA Authorizations for all five medical providers. Because the subpoenas contain confidential information, Defendants will email unredacted PDFs of the subpoenas to Your Honor's Chambers, with Plaintiff's counsel cc'd on the email. Should the Court grant this application, a representative from my Office is available to pick up the so ordered subpoenas with Your Honor's original signature at the Court's earliest convenience.

I thank the Court for its consideration and attention to this matter.

Respectfully submitted,

Steven E. Smith
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)